

# DNR/PEI FILE EXCHANGE NOTES

July 6, 2005

Attendees:

Vern Schrunk—DNR

Ken McFadden--PEI

- **POLICY/GUIDANCE AND/OR JUDGMENT ISSUES:**

**8LTR72, Plymouth Cooperative Oil Company, Hinton,** SMR reclassification (L2N) 3 SMRs, recommend reject, previously accepted as High Risk in the November 29, 2000 and June 19, 2001 DNR letters and Low Risk in the February 27, 2002 DNR letter. (Rev-EM, QA-KM).

Selected section as presented in the draft RP letter:

**For DNR Review:** Upon review of the report and file information, the site remains classified as **Low Risk**. The Groundwater Ingestion to Protected Groundwater pathway remains low risk, pending submission of appropriate and required Institutional Control documentation. Also, the Groundwater Vapor to Potential Confined Space pathway remains low risk. Steady and declining criteria has not been met. Additionally, the groundwater source maximum and location is questioned. Refer to deficiency #1 of the deficiency list for the SMR received on March 28, 2003.

**Concerning SMR received on March 28, 2003:**

1. **For DNR Review:** The groundwater source and maximum location is questioned. The benzene SMR, Groundwater/Soil Leaching Monitoring Plan Summary, page 12, is questioned. According to the accepted Tier 2 received on September 11, 2001, the groundwater source is B-6(Coop) with 5,800 ppb benzene. However, subsequent SMRs present MW-1C with 8,348 ppb benzene at the groundwater source according to the Tier 2 software file provided and in the "SMR, Groundwater/Soil Leaching Monitoring Plan Summary (page 12)". Apparently the X, Y coordinates for MW-1B and MW-1C have inexplicably switched from the accepted Tier 2. According to the accepted Tier 2, the X, Y coordinates for MW-1B and MW-1C are 161, 284 and 102, 161, respectively. According to the subsequent SMRs, the X, Y coordinates for MW-1B and MW-1C are 103, 161 and 161, 284, respectively. Justification/ explanation for the change in coordinates is not provided. Please clarify, explain, address and revise all affected SMR sections. Note: If the groundwater source changes from B-6(Coop) to MW-1C, reevaluate the Tier 2. All affected Tier 2 sections are required (e.g. due to the reevaluation) includes the notifications.
2. The Evaluation of Analytical Data (Appendix 1) is incomplete and questioned. A groundwater benzene source well is not identified or discussed. Neither B-6(Coop)/MW103 nor MW1C is presented at the benzene groundwater source well. Furthermore, no explanation for the changed groundwater benzene source location/concentration from B-6Coop/MW103 to MW1C is provided. Refer to aforementioned deficiency #1. Provide a revised Appendix 1 upon resolution of deficiency #1.

Refer to file deliverables and draft RP letter for additional def's 3,4, and 5.

**Concerning reclassification SMR received on December 1, 2004:**

(Refer to draft RP letter for def's 1 and 2)

1. **For DNR Legal Review:** The Institutional Control documentation is incomplete and inadequate. Not all required documentation is provided. Refer to the Groundwater Professional Bulletin Board web posting dated 12/6/2004 ("*model certification letter from the local permitting authority and a new certification letter from the County Department of Health if they have delegated permitting authority from the Department.*"). The department acknowledges a letter from the county authority has been provided. However, the letter from the local authority has not been provided. Also, refer to page 67 of the Tier 2 guidance for required information. The Groundwater Contamination Plume Maps are not copies from the accepted Tier 2 (Note: Refer to deficiency #1 of the deficiency list for the SMR received on March 28,

2003 and deficiency #2 of the deficiency list for the SMR received on October 31, 2003.). Please address and revise.

Refer to file deliverables and draft RP letter for additional text. File returned today.

- **PROJECT MANAGEMENT:**

**8LTP85, F & F Quik Mart, Webster City, SMR reclass H2L, (Firm-ATC) (2 SMRs with T2 revisions and RT2. 9/00 orig T2 accept LR, 7/03 RT2 accept HR/CADR due, CADR never submitted, teleconference scheduled for 4/12/05, 2/17/05 CGP commits to reclass SMR,**

“Teleconference” RP letter format considered but not used due to the numerous and inter-related deficiencies. 4/13/05 SMR reclass contained a RT2 citing >20% as reason for reeval. However, reeval criteria not met contrary to CGP statements. RT2 was unnecessary resulting in numerous ramifications and complications. ((Note 8LTP85 and 8LTI97 both contained unnecessary RT2----at JH request emailed and faxed to JH (6/1/05) as examples.)) Multiple def’s and issues.

Included for DNR consideration the paragraph *“The department strongly recommends that your CGP thoroughly review Tier 2 guidance and V2.51 Tier2/SMR software user’s manual prior to....”*

Refer to file deliverables and draft RP letter for specific def’s and issues. File returned today.